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December 22, 2020

By ECF

The Honorable Victor Marrero
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

*Re: United States v. Derrick Richardson,
20 Cr. 299 (VM)*

Dear Judge Marrero:

We represent Defendant Derrick Richardson in the above-referenced matter and write, with the consent of the Government, to respectfully request a 60-day adjournment of the status conference currently scheduled for January 15, 2021, at 9:00 a.m., to a date and time convenient to the Court.

An adjournment is requested to provide the defense with more time to review the discovery. The discovery material that has been produced to date totals approximately 165 gigabytes (approx. 30,000 files within 775 folders). It includes investigative and other documents, multiple folders of inmate jail calls and Corlinks emails, social media accounts, proprietary surveillance video and reproductions of materials produced to the defendants in two related cases. Defense counsel have made progress in our review of the discovery and have begun reviewing it with Mr. Richardson, however Mr. Richardson only received his copy of the discovery one week ago, on or about December 14, 2020. Thus, both counsel and the defendant require additional time to review the discovery in this case.

I have emailed with AUSA Anden Chow and he has informed me that the Government consents to Defendant's request for a 60-day adjournment. On behalf of Mr. Richardson, defense counsel also consent to the exclusion of time under the Speedy Trial Act until the adjournment date.

As always, Your Honor's time and consideration is greatly appreciated.

The request is granted. The status conference scheduled for 1/15/21 is adjourned until 3/19/21 at 9:00 a.m. Upon consent of the parties, time is excluded under the Speedy Trial Act, 18 USC Sec. 3161(h)(7)(B)(i)&(iv).

SO ORDERED.

12/28/2020

DATE


VICTOR MARRERO, U.S.D.J.

Respectfully submitted,



Michael K. Bachrach

John A. Diaz

Attorneys for Defendant Derrick Richardson